

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Jermaine Cook

Case No. Case: 2:24-mj-30339
Assigned To : Unassigned
Assign. Date : 8/12/2024
USA V. SEALED (CMP)(CMC)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 14, 2024 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Code Section
18 U.S.C. § 922(g)(1)

Offense Description
Felon in possession of ammunition.

This criminal complaint is based on these facts:
See attached affidavit.

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: August 12, 2024

City and state: Detroit, Michigan


Complainant's signature

Terry Cross-Nelson, Task Force Officer-ATF
Printed name and title


Judge's signature

Hon. Kimberly G. Altman, United States Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Task Force Officer Terry Cross-Nelson, being duly sworn, do hereby state the following:

I. INTRODUCTION

1. I am a dedicated Police Detective with an extensive tenure of over 21 years of service within the Detroit Police Department. I currently hold the role of a Federal Task Force Officer, operating as an integral part of the Firearms Investigation Team, collaborating with the Bureau of Alcohol, Tobacco, Firearms, and Explosives Task Force. I have held this role since December 2022, during which my primary focus has been investigating a broad spectrum of firearm-related activities within the City of Detroit. I hold the official status of an "investigative or law enforcement officer of the United States" as defined under 18 U.S.C. § 2510(7). This status empowers me to conduct in-depth investigations and arrests in connection with offenses as delineated under federal law.

2. With over a decade of experience in investigative roles, I have garnered substantial expertise in this field. I completed my training at the Detroit Police Academy. Throughout my career, I have actively participated in a multitude of cases, contributing

significantly to the procurement of search warrants, apprehensions, and the subsequent successful prosecutions of individuals involved in criminal activities. My educational background is equally robust, featuring two degrees – a Bachelor's and a Master's – in Business Administration and Public Leadership, both conferred by Cleary University.

3. The information contained in this affidavit is based both on my investigation and information provided to me by or through other law enforcement agents, investigators, and individuals with knowledge of this matter.

4. This affidavit establishes probable cause that Jermaine COOK violated 18 U.S.C. § 922(g)(1), as a felon in possession of ammunition on July 14, 2024, in the Eastern District of Michigan. This affidavit sets forth probable cause that the offenses described were committed but does not include all the information known to law enforcement related to this investigation.

II. PROBABLE CAUSE

5. On July 14, 2024, at approximately 2:30 am, my partners and I worked the Drag Race and Block Party Detail. We were traveling east on Clements Street from Linwood Street when officers observed a possible block party on the south side of Clements

Street near the middle of the block. Officers observed approximately 10 persons standing in the street, near the sidewalk, and on the front lawn. They traveled closer to the possible block party and observed a male, later identified as Jermaine COOK, wearing a green shirt, black sweatpants, and white shoes, standing near the roadway.

6. COOK began walking west toward the marked vehicle, looking in its direction; however, COOK immediately turned 180 degrees as if he was startled by the police presence. He quickly began walking east away from the marked vehicle. Officers observed COOK place his right hand near his right pocket. Based on their training and experience with multiple concealed weapons arrests, COOK's actions were consistent with a person in possession of a concealed weapon or contraband. When officers illuminated COOK with a flashlight, COOK immediately began running eastbound across the front lawn.

7. Officers exited the marked vehicle and initiated a foot pursuit. Officers loudly gave COOK a verbal command to "Stop." As COOK ran south on a Clements Street. driveway he tripped over an unknown object. COOK landed on his chest, and officers detained him without incident.

8. Officers conducted a pat-down of his person and felt a hard object, consistent with the size and shape of a firearm, on the right side of his shorts. Officers then recovered a black and blue Polymer 80 PF940C 9mm handgun, without a serial number, from his right shorts pocket. The firearm was loaded with a live 9mm round in the chamber but did not have a magazine. Officers recovered an extended magazine containing thirty-one (31) live 9mm rounds from COOK's person.

9. Per LEIN, COOK is not a valid Concealed Pistol License holder and was placed under arrest. COOK'S computerized criminal history reveals the following felony conviction in the state of Michigan:

- 11/23/2004 – Criminal Sexual Conduct with intent to with intent to commit sexual penetration – 3rd Circuit Court

10. COOK was sentenced to serve more than one year in prison for his 2004 case; thus, there is probable cause that COOK knew he had previously been convicted of a felony prior to the offense date.

11. On August 2, 2024, Special Agent Kara Klupacs an ATF Interstate Nexus Expert, advised, based on a verbal description

of the ammunition, that the 31 live rounds of 9mm ammunition was manufactured outside the state of Michigan and, therefore, had traveled through interstate or foreign commerce.

III. CONCLUSION


12. Probable cause exists that Jermaine COOK, a previously convicted felon, knowing that he was previously convicted of an offense punishable by more than one year imprisonment, was in possession of the above-described ammunition, said ammunition having traveled in interstate commerce, in violation of Title 18 U.S.C. § 922(g)(1).

Respectfully submitted,



Terry Cross-Nelson II
Task Force Officer, ATF

Sworn to before me and signed in my presence and/or by reliable electronic means.



Hon. Kimberly G. Altman
United States Magistrate Judge

Dated: August 12, 2024